

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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RAW STORY MEDIA, INC., ALTERNET	:	
MEDIA, INC.,	:	No. 1:24-cv-01514-SHS
	:	
Plaintiffs,	:	No. 1:25-md-03143-SHS
	:	
v.	:	
	:	
OPENAI, INC., OPENAI GP, LLC,	:	
OPENAI, LLC, OPENAI OPKO LLC,	:	
OPENAI GLOBAL LLC, OAI	:	
CORPORATION, LLC, OPENAI	:	
HOLDINGS, LLC,	:	
	:	
Defendants.	:	
	:	
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**DEFENDANTS’ NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF  
OPPOSITION TO PLAINTIFFS’ MOTION FOR RECONSIDERATION**

Defendants OpenAI, Inc., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, L.L.C., OpenAI Global, L.L.C., OAI Corporation, and OpenAI Holdings, L.L.C. (collectively, “OpenAI”), by and through counsel, respectfully submit this Notice of Supplemental Authority to apprise the Court of a recent order that further supports OpenAI’s Opposition to Plaintiff’s Motion for Reconsideration (ECF 139).

On June 5, 2025, the United States Supreme Court decided *BLOM Bank SAL v. Honickman et al.*, No. 23-1259, slip op. (U.S. June 5, 2025), a case involving the standard for relief under Federal Rule of Civil Procedure 60(b)(6) (slip opinion attached hereto as Exhibit A). In particular, the Supreme Court explained that the “text and structure of Rule 60 make clear that relief under Rule 60(b)(6) is available only in narrow circumstances,” that it “provides only grounds for relief not already covered by the preceding five paragraphs” of Rule 60, and that, “even then, extraordinary circumstances must justify reopening” a final judgment, order, or proceeding.

*BLOM Bank*, slip op. at 6 (quoting *Kemp v. United States*, 596 U.S. 528, 533 (2022)). The Court also reviewed binding Supreme Court precedent that “underscored the stringency of the ‘extraordinary circumstances test,’” noting that “[t]his very strict interpretation of Rule 60(b) is essential if the finality of judgments is to be preserved.” *Id.* at 7–8 (quoting *Gonzales v. Crosby*, 545 U.S. 524, 535 (2005)). This decision is relevant to Section III.B.2. of OpenAI’s Opposition to Plaintiffs’ Motion for Reconsideration, which argues that “Plaintiffs do not meet the Rule 60(b)(6) standard.” ECF 152 at 5–6.

Dated: June 6, 2025

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